

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD JULY 1, 2023 THROUGH JULY 31, 2023**

Debtor: LTL Management LLC

Applicant: Wollmuth Maher & Deutsch LLP

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

X Monthly Fee Statement No. 4 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1, 2023 through July 31, 2023 (the "Fourth Statement Period").

Total Fees:	\$256,449.50
Total Disbursements:	\$3,888.91
Total Fees Plus Disbursements:	\$260,338.41
Minus 20% Holdback of Fees:	\$51,289.90
Amount Sought at this Time:	\$209,048.51

	<u>FEEs</u>	<u>EXPENSEs</u>
Total Previous Fees Requested:	<u>\$1,217,548.75</u>	<u>\$19,453.89</u>
Total Fees Allowed to Date:	<u>\$0</u>	<u>\$0</u>
Total Retainer (If Applicable):	<u>\$0</u>	<u>\$0</u>
Total Holdback (If Applicable):	<u>\$243,509.75</u>	<u>\$0</u>
Total Received by Applicant:	<u>\$974,039.00</u>	<u>\$19,453.89</u>

Name of Professional & Title	Year Admitted	Hours	Rate	Fees
Paul R. DeFilippo, Esq., Partner	1978	34.6	\$975	\$33,735.00
James N. Lawlor, Esq., Partner	1992	75.2	\$910	\$68,432.00
Joseph F. Pacelli, Esq., Associate	2020	75.0	\$635	\$47,625.00
Logan R. Leonard, Esq., Associate	2022	82.1	\$440	\$36,124.00
Stephanie A. Weaver, Esq., Associate	2023	139.1	\$440	\$61,204.00
Reagan F. Flynn, Paralegal	N/A	7.4	\$235	\$1,739.00
Alexander T. Cukier, Paralegal	N/A	11.9	\$235	\$2,796.50
Michele Klinger, Paralegal	N/A	20.4	\$235	\$4,794.00

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0
b) Asset Disposition: Sales, leases, abandonment and related transaction work.	0	0
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.	0	0
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	0
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	44.5	\$24,730.50
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	8.4	\$4,994.00
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	190.2	\$89,492.50
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.	15.4	\$10,198.50
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0	0
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	129.6	\$86,958.50
l) Meeting of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	0	0

SERVICES RENDERED	HOURS	FEES
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	57.6	\$40,075.50
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.	0	0
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0	0
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0
t) Reconstruction Accounting: Reconstructing books and records from past transactions and bringing accounting current.	0	0
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.	0	0
v) Valuation: Appraise or review appraisals of assets.	0	0
w) Travel Time	0	0
SERVICE TOTALS	445.7	\$256,449.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
06/28/2023 - Travel to Trenton NJ-LRL	\$289.75
06/29/2023 - Travel to Trenton NJ-LRL	\$294.42
07/03/2023 - J & J Court Transcribers inv # 2023-01435 Transcript	\$2,855.60
07/05/2023 - PHV admission payment of 1 attorney	\$150.00
07/05/2023 - 2023 PHV payment of 1 attorney	\$239.00
07/10/2023 - Courier Service- Richard J. Hughes Justice Complex	\$30.07
07/10/2023 - Courier Service-U.S. District Court N.J.	\$30.07
DISBURSEMENTS TOTALS	\$3,888.91

**SECTION IV
CASE HISTORY**

1. Date of Retention: June 14, 2023, effective as of April 4, 2023 [Dkt. 770] (the “Retention Order”).¹
2. Summary explaining the nature of the work performed and the results achieved:
 - Facilitated the drafting, finalization and/or filing of several documents, including: (i) objection to FCR disqualification motion, (ii) objection to substantial contribution motions, (iii) proposed findings and fact and conclusions of law regarding the motions to dismiss, (iv) amended disclosure statement, (v) ordinary course professional declaration, (vi) pro hac vice application in district court, (vii) motion to extend removal period, (viii) monthly fee statements for the Debtor’s professionals, (ix), certifications of no objection regarding monthly fee statements and other documents for the Debtor’s professionals (x), solicitation motion (xi) amended exhibit to chapter 11 plan, (xii), adjournment requests, (xiii) stipulation regarding motion to dismiss hearing evidence, (xiv) preliminary injunction extension order, (xv) hearing agendas, (xvi) monthly operating report, and (xvii) certificates of service in the district court appeals cases;
 - Analyzed issues and counseled the Debtor with respect to, among other things, (i) retention of the Debtor’s professionals, (ii) chapter 11 case and adversary proceeding, (iii) appeals cases related to the preliminary injunction and FCR appointment orders, and (iv) discovery;
 - Participated in the hearings and conferences held during this period and counseled the Debtor with respect thereto;
 - Monitored main case, adversary proceeding, and appeals dockets; and
 - Interfaced on a daily basis with the Debtor and/or its other professionals to facilitate the Debtor’s administrative processes, including adherence to the local bankruptcy rules and filing procedures.

I certify under penalty of perjury that the above is true.

Date: September 7, 2023

/s/ Paul R. DeFilippo
Paul R. DeFilippo

¹ The Retention Order is attached hereto as Exhibit A.